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August 17, 2023

VIA CM/ECF

The Honorable Pamela K. Chen
United States District Judge
U.S. District Court, Eastern District of New York
225 Cadman Plaza East, Room N 631
Brooklyn, NY 11201

Re: Bank v. Alleviate Tax, LLC., Civil Action No. 1:23-CV-05457-PKC-PK (E.D.N.Y)

Dear Judge Chen:

We represent Defendant Alleviate Tax, LLC (“Alleviate”) in the above referenced matter.¹ We submit this letter in accordance with the directive in Your Honor’s Order dated August 14, 2023, to confirm that Alleviate will be filing an amended motion for pre-motion conference in response to Plaintiff’s Amended Complaint (DE 12). The amended motion will be filed on or before Alleviate’s August 25, 2023 deadline to respond to the Amended Complaint.

Respectfully submitted,

/s/ Philip Z. Langer

Philip Z. Langer, Esq.

cc: Counsel of record via CM/ECF

¹ Eric J. Troutman and Jenniffer Cabrera, of Troutman Amin, LLP, will be lead counsel for Alleviate in this case and are in the process of obtaining pro hac vice admission before the Court.